# "See Something Say Something"

**VNG Approach to Damage Prevention** 

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# Agenda – "See Something Say Something"



- 1. VNG Federal Regulations
  - DHS CFATS
  - TSA Pipeline Security Guidelines
- 2. TSA Critical Facility Criteria and Security Directives
- 3. VNG Physical Security Countermeasures
- 4. AGA and VNG Field Worker Initiatives
- 5. Threat Intelligence Sharing and Dissemination
- 6. Movie: How To Blow Up a Pipeline
- 7. "See Something Say Something Campaign"
- 8. Questions





## 1. VNG Federal Regulators (Physical Security) – DHS and TSA



VNG is regulated by the Department of Homeland (DHS) Security Chemical Facilities Anti-Terrorism Standards (2013) and the Transportation Security Administration (TSA) Pipeline Security Guidelines (2002).

**DHS CFATS Inspections** – Both the 2 CFATS Tiered Facilities (Chesapeake LPG, Pivotal LPG) since 2014 have passed the yearly onsite DHS inspection with minimal "Items for Consideration" (DHS slang for "Recommendations").

**TSA Pipeline Security Guidelines** – The first recorded Corporate Security Review for AGL was Conducted in 2011. There were significant findings related to "lack of documentation". At that time, based on the Critical Facility Criteria, no VNG Facilities were deemed "critical".

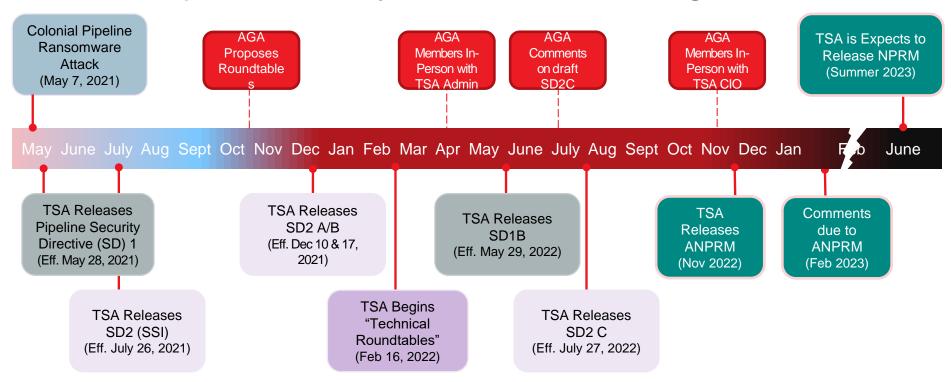
2015 – Significant program improvements were noted by TSA including Corporate Security Plan development, Site Security Plan development, cyber security controls, an annual site audits. At that time, based on the Critical Facility Criteria, no VNG Facilities were deemed "critical".

2018 – Significant "Best Practices" were noted including enhanced background check processes, including Insider Threat Program implementation, enhanced cyber security controls, and Gas Control security practices.





## 2. TSA Pipeline Security Directive/Rulemaking Timeline



TSA gets audited: GAO's analysis showed that operators of at least 34 of the nation's top 100 critical pipeline systems (determined by volume of product transported) deemed highest risk had identified no critical facilities. This may be due, in part, to the guidelines not clearly defining the criteria to determine facilities' criticality.

## 2. Updated TSA Critical Facility Criteria – Final Version (Cont)



**Criteria #1** – Disrupt or significantly reduce required service or deliverability to installations identified as critical to national defense.

**Criteria #2** – Disrupt or significantly reduce required service or deliverability to key infrastructure (such as power plants or major airports) resulting in major operational disruption.

**Criteria #3** – Cause mass injuries, casualties or significant health or environmental effects. Is the facility identified as any of the following:

- Distribution Facility operating at a pressure equal to or greater than 125 psig?;
- Distribution Facility operating in a Class 4 location;
- Distribution Facility operating in a Class 3 location that does not have regulators installed at the customer delivery point or redundant overpressure protection systems;

## 2. Updated TSA Critical Facility Criteria – Final Version (Cont)



**Criteria #4** – Disrupt or significantly reduce required service or deliverability resulting in a state or local government's inability to provide essential public services and emergency response for an extended period of time.

**Criteria #5** – Only applies to Liquid Pipelines

**Criteria #6** – Disrupt or significantly reduce required service or deliverability to a significant number of customers or individuals for an extended period of time -100,000 Meters

**Criteria #7** – Significantly disrupt pipeline system operations for an extended period of time – 7 Days





## 2. Updated TSA Critical Facility Criteria – VNG Response



### **Critical Facility Security Implementation Program Approach**

- Corporate Security will manage the overall site and asset class security assessment project
- The Steering Committee will prioritize available budget
- Individual project management will be owned by separate OPCO teams
- Corporate Security and Regulatory will lead on TSA Critical Facility Security Reviews and involve the appropriate OPCO personnel
- Corporate Security and Regulatory will continue to interface with AGA on TSA Critical Facility program feedback

Steering Committee (one representative from each, manager level or above):

Corporate Security – (Committee Chair)

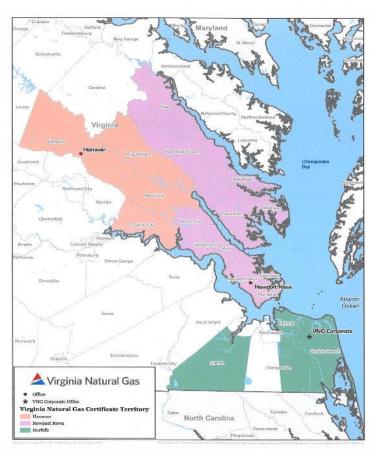
System Planning
 DiMP
 Transmission
 Cyber Security\*
 Compliance

Gas Control
 Pressure Control
 Real Time System Support



## 2. Updated TSA Critical Facility Criteria - VNG Service Territory





## 2. Updated TSA Critical Facility Criteria – VNG Analysis



### **Critical Facility Selection Process:**

- Daily Flow Degree Day Flow
- System Redundancy
- Serving Critical Infrastructure Firm or Interruptible Contracts
- Meter Counts
- Gas Control Input
- SCADA Monitoring
- Distribution and Transmission Department Input
- AGA Utility Peer Discussions



# 2. Updated TSA Critical Facility Criteria VNG Asset Classes Summary



- > 100 Distribution Regulator Stations
- > 30 Transmission Stations
- >30 Main Line Valves
- 2 Propane Plants
- DOD Bases Served 13
- First Responder Infrastructure > 200 Meters



Bottom Line: more than 2 Dozen VNG Facilities were determined to meet the new TSA Critical Facility Criteria therefore requiring an enhanced level of physical security and "periodic" inspection by the TSA



## 3. Physical Security Principles - VNG - Countermeasures



**Deter** – No Trespassing Signs, Bollards, Guard Rails, Jersey Barriers, Chain Link Fence and Top Guard, Privacy Fencing, K-Rate Gates, Security Lighting, Audio Warning

**Delay** – Underground Vault with Door, Perimeter Case Hardened Lock, Valve Case Hardened Lock, Building/Hut Lock

**Detect** – Real Time Video Surveillance, Intrusion Detection – Fence and/or Building, Motion Detection System, Gas System Equipment Monitoring (SCADA)

**Defend** – Arrange for Armed Security Officer

Respond – Dispatch Operation Mechanic, Dispatch Corporate Security personnel, call local Law Enforcement





## 3. Physical Security Principles - VNG Countermeasures (Cont)



We Can't Protect Everything:

Performed Security Assessments at all TSA Critical Facilities
Continue to implement video surveillance TSA at Critical Facilities
Upgrade Fences and Gates at selected locations
Deploy Multi-lingual "No Trespassing" Signs at all stations
Coordinate Future (2023-2024) Construction Activities with Corporate Security
Identified Tier 2 Facilities (Not TSA Critical but Important to VNG Operations)
Continue to monitor threat intelligence community for local and industry threats
Continual internal reminders of "See Something Say Something"
Planning for TSA Critical Facility Site Reviews

SD2 Response – Southern Company Gas' SD2 Response Plan was Approved by TSA in January 2023





## 4. AGA and VNG Field Worker Safety Enhancement Initiatives

#### **AGA Efforts**

Annual Workshop with Topics including:

- Lessons Learned from the Field
- De-escalation Training
- How to Set Up a Field Worker Assault Prevention Program
- Using Technologies to Help Ensure Lone Workers are Safe
- Working with Law Enforcement to Combat Field Worker Assaults

### **Virginia Natural Gas Efforts**

- Negotiated contracts with multiple armed guard services to escort field workers to worksite – scheduled by field organization – knows worksite best
- Created Situational Awareness Training Course for Field Employees – Delivered in person
- Piloted Field Worker Safety/Security
   Technologies and Chose to Deploy One Across the Enterprise (including Electric OPCOs)
- Deployed new Mass Notification Tool for field worker notification of outages and warnings, configurable by region and department



## **5. SCG Threat Intelligence Activities**



Physical Security Operations Center-E PSOC-E

Monitors the following Threat Intelligence Feeds -----→

Utilizes Tools to Monitor Address References on Social Media Platforms

Monitoring Center for Field Worker Safety Devices

Staffed 24X7X365

**Atlanta Joint Terrorism Task Force (JTTF)** 

Georgia Bureau of Investigation (GBI)

**National Counterterrorism Center (NCCIC)** 

**METROPOL (Atlanta Metropolitan Police)** 

New Jersey Cybersecurity & Communications Integration Cell (NJCCIC)

Virginia State Fusion Center – VCC Shield

**Department of Justice DOJ** 

AGA - NGSC

EEI

**EISAC** 

**DNG-ISAC** 

MS - ISAC

**DHS - IAIP and NTAS** 

HSIN - Infragard (FBI)

## 6. How To Blow Up A Pipeline





## 6. How To Blow Up A Pipeline - Background



FILM BACKGROUND: How to Blow Up a Pipeline is a 2022 film that was adapted from Andreas Malm's 2021 book by the same name. The book is a work of non-fiction that uses a history of social justice movements to argue that property destruction should be considered a valid tactic in the pursuit of environmental justice. The film, set primarily in West Texas, revolves around a group of eight young people who decide to blow up an oil pipeline.

The film was debuted at the Toronto International Film Festival (TIFF) in September 2022. After the premier, NEON (an American independent film production company) purchased the film with the intent to release it in theaters in the U.S. The film was released to theaters in the U.S. on 7 April 2023; The official trailer for the film can be found on YouTube (Link).

NOVEL AND ADDITIONAL BACKGROUND: How to Blow Up a Pipeline: Learning to Fight in a World of Fire is a non-fiction book written by Swedish author Andreas Malm and published in January 2021. The book argues that sabotage is a logical form of climate activism and criticizes pacifism within the climate movement. It is divided into three chapters – Learning from Past Struggles, Breaking the Spell and Fighting Despair - and is available in print and digitally on a variety of online platforms.

Prior to the release of How to Blow Up a Pipeline, Malm had written several other books related to politics, the economy, climate change and fossil fuels. Malm's newest book, White Skin, Black Fuel, was published in May 2021.

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## 7. Corporate Security – See Something, Say Something

Guided by CULTURE

Lead by STRATEGY Focused or CUSTOMER

Informed by DATA Enabled by TECHNOLOGY

Executed with PURPOSE

Optimized for RESULTS

We all have a duty to remain diligent and "If you see something, say something". Remain aware of suspicious behaviors or indicators and immediately contact **Corporate Security**, your supervisor, or dispatch. Never confront suspicious persons, and never put your personal safety at risk.

#### Examples to be aware of include:

- Suspicious or illegally parked vehicles on property,
- Holes in fences,
- Missing locks,
- Signs of intrusion,
- Gaps in gate closing,
- Unauthorized persons on or near property taking photos,
- Discreet use of cameras, video recorders,
- Unauthorized entry to restricted areas,
- Increased traffic around or near facilities,
- Drones above company properties,
- Unattended bags, packages, suspicious equipment left in open areas or hidden in trash cans, and
- Theft of employee identification/access badges

Contact **Corporate Security** immediately if you see something that could adversely affect the company's ability to deliver the clean, safe, reliable and affordable natural gas customers expect and deserve.

#### Company Information Bulletin



Deliver. Enrich. Invest.

{ Thursday, April 6, 2023 }

#### If you see something, say something.

A new movie set for release this Friday serves as a reminder to remain vigilant to protect natural gas' vital infrastructure.

To: Southern Company Gas Employees

A Hollywood movie titled "How to Blow up a Pipeline: Learning to Fight in a World on Fire" is set for release April 7, and while described as fictional, it depicts illegal and dangerous actions that seek to damage critical pipeline infrastructure.

The movie is based on a <u>book of the same title</u> written by Andreas Malm, a Swedish author and professor who tells the story of several protagonists' attempts to destroy liquid pipelines as an act of environmental terrorism to combat climate change.

Southern Company Gas' natural gas pipeline infrastructure was built and designed to operate safely and in accordance with federal regulations and pipeline safety standards. With both physical and infrastructure security measures in place, ensuring our approximately 4.4 million oustomers receive clean, safe, reliable and affordable natural gas—safety—is always our number one value.

The company's commitment to pipeline, customer and community safety is extensive and unwavering:

- Southern Company Gas remains committed to maintaining safe and reliable natural gas pipeline infrastructure
  that serves the needs of customers, including emergency preparedness.
- Local distribution companies work with local and regional emergency response officials located near pipeline facilities to ensure a better understanding of the nature of the company's infrastructure and emergency preparedness plans.
- Southern Company Gas also works closely with state and federal regulatory agencies to ensure that the
  company complies with the various pipeline safety laws and regulations.
- The Gas Control Operations Center continuously monitors the flow of natural gas through our pipelines and any changes in operating conditions.

The federal safety program for onshore pipelines, including natural gas, is administered by the Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA).

Among PHMSA's responsibilities is to conduct programmatic inspections of management systems, procedures, processes, facilities and construction; investigate safety incidents; and maintain a dialogue with pipeline operators. PHMSA also is involved with pipeline security oversight and incident response in cooperation with the Transportation Security Administration.

It is always important to be aware of any depictions of harmful and disruptive actions that could encourage potential safety consequences. In coordination with industry partners such as the American Gas Association and the Interstate Natural Gas Association of America, as well as local, state and federal security agencies, employees are asked to remain vigilant and alert to help protect infrastructures and systems.

"If you see something, say something" is the action encouraged for use by all employees. It means staying aware of suspicious behaviors or indicators and immediately contacting <u>Corporate Security</u>, your supervisor or dispatch. Never confront suspicious persons, and never put your personal safety at risk.

## 7. See Something Say Something – VNG Response



## Follow-Up "Don't Make It Easy" Campaign

- Always lock your vehicle and tool cabinets when you are not in your vehicle.
- Ensure all vehicle gates are securely locked when you leave a gate station.
- Ensure all building/huts are securely locked when you leave a gate station.
- Look for any fence or gate anomalies when onsite at a station and report any issues to Corporate Security.
- Ensure that contractors are always escorted at stations.
- Report any unusual contact with the public at stations.
- Always display your badge.



Virginia Natural Gas

## 8. Questions?



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